

**Federal Defenders
OF NEW YORK, INC.**

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February 1, 2023

Via ECF

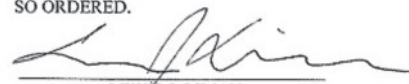
The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

REQUEST GRANTED.

The time for defendant to submit pretrial motions is extended to April 4, 2023. Government's opposition briefs due by April 18, 2023. The Motion hearing is rescheduled to April 26, 2023 at 2:00PM in Courtroom 15C. The Court, at request of the Government and with consent of defendant, excludes time from February 2, 2023 until April 26, 2023 pursuant to the Speedy Trial Act, 18 USC 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendant in a speedy trial, in that the time between now and April 26 can be used by the defendant to consider and prepare motions, and for parties to discuss a potential pretrial disposition.

**Re: United States v. Raquel Moura Borges
21 Cr. 172 (LJL)**

2/2/2023 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Dear Judge Liman,

We write with the consent of the Government to respectfully request that the Court adjourn the February 3, 2023 motion deadline and the February 24, 2023 pretrial conference in this matter for approximately 60 days. This is the defense's third request for an adjournment.

As discussed in our previous correspondence, the parties have been engaged in discussions regarding a potential pretrial resolution in this matter and the parallel civil enforcement proceeding captioned *SEC v. Borges*, 20 Civ. 10051 (GBD) (S.D.N.Y.). So that the parties may continue to pursue these discussions and potentially resolve this matter without motion practice, we respectfully request that the Court adjourn, for approximately 60 days, the current motion deadline and pretrial conference date.

Should the Court grant this application, the Government requests, and the defense consents to, the exclusion of time under the Speedy Trial Act until the rescheduled conference date.

Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
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cc: AUSA Andrew Thomas